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August 9, 2018

Via ECF

The Honorable Donovan W. Frank
United States District Court
316 North Robert Street
St. Paul, Minnesota 55101

Re: *The Estate of Vivian Maier v. MPLS Photo Center, LLC*
Court File No.: 17-CV-02329 (DWF/DTS)
Our File No. 8412-1

Dear Judge Frank:

Our office is local counsel for Plaintiff in the above-captioned action. Mr. James Griffith of Marshall, Gerstein & Borun LLP is lead counsel and is based in Chicago. Mr. Griffith has been admitted pro hac vice to represent Plaintiff.

The hearing concerning Plaintiff's recently filed motion for entry of default judgment is set for October 5, 2018 at 8:30 a.m. If possible, Plaintiff would like lead counsel to appear and argue the motion. Among the reasons Plaintiff would like Mr. Griffith to appear and argue the motion are that he and his firm led all discovery efforts and he is the attorney most familiar with the relevant facts and law. However, the cost for Mr. Griffith to travel to Minneapolis to appear and argue in person seems disproportionate. Thus, we write to request leave for Mr. Griffith to appear and argue the motion via telephone.

If our request for lead counsel to appear and argue via telephone is granted, I will also appear in person so that in the event the Defendant does appear the proceedings can continue.

Thank you.

Respectfully submitted,

/s/Jonathan C. Marquet

Jonathan C. Marquet

JCM:vlc

cc, *via U.S. mail*:
MPLS Photo Center, LLC
c/o Jeff Harrington (Owner)